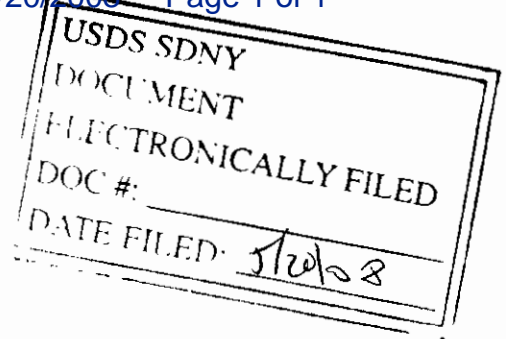


MEMO ENDORSED

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May 19, 2008

VIA E-MAIL: (eileen_levine@nysd.uscourts.gov)

Honorable Richard J. Sullivan
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

JOINT APPLICATION

Re: Federal Insurance Co. v. Maersk
07 Civ. 11349 (RJS)
Our File: 7C-1492

Dear Judge Sullivan:

I represent the plaintiff in this admiralty action which involves a claim for cargo loss. This joint letter of counsel is respectfully submitted pursuant to the Court's directive at the conference held on April 17, 2008.

Counsel are continuing discussions in an effort to explore settlement. There remain certain factual issues as well as divergent views on certain legal issues. Due to the size of the claim, counsel would like to continue the discussions for another two weeks before going forward with formal litigation steps. For this reason counsel join in respectfully requesting permission to report by June 2, 2008 concerning either settlement or a proposed case management plan. The Court's attention is appreciated.

Respectfully,

s/David L. Mazaroli

David L. Mazaroli

cc: Freehill, Hogan & Mahar LLP
Attn.: Michael Fernandez, Esq.
(Via E-mail: Fernandez@Freehill.com)

DeOrchis & Partners LLP
Attn.: John Orzel, Esq.
(Via E-mail: Jorzel@marinelex.com)

SO ORDERED
Dated: *5/20/08*

RICHARD J. SULLIVAN
U.S.D.J.